

# **EXHIBIT 2**

**From:** [Steven Benedict](#)  
**To:** [David Grassi](#)  
**Cc:** [sally.odom@theecholsfirm.com](mailto:sally.odom@theecholsfirm.com); [Chad Diamond](#); [Caren Enloe](#)  
**Subject:** Hallager Notice of Deposition  
**Date:** Friday, April 16, 2021 4:27:35 PM

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Counsel,

I am in receipt of your Notice of Deposition. I will get back to you on if the date works for our client.

Plaintiff anticipates serving deposition notices Monday for a date in May do you have available dates?

Further, since your client just recently filed its Answer I am requesting consent to amend/extend the scheduling order by 2 months to allow for expert discovery.

Do we have the consent of Defendants?

Also we are amenable to discussing settling this matter. Please call me to discuss 201 500 6961.

Thank you.

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